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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff,

vs.

WEDCO, INC., and DOES 1-10,

Defendants

) Case No.: 3:12-CV-00523-RCJ-VPC
)
)

**STIPULATION AND [PROPOSED]
ORDER TO SET A CASE
MANAGEMENT CONFERENCE TO
RESOLVE DISCOVERY DISPUTES**

) Judge: Honorable Valerie P. Cooke
) United States Magistrate Judge
)

Plaintiff, the United States Equal Employment Opportunity Commission ("EEOC" or the "Commission"), and Defendant Wedco, Inc. ("Defendant" or "Wedco"), by and through their respective attorneys of record, hereby stipulate and agree to: (1) advise the Court that the parties wish to resolve their outstanding discovery disputes through a case management conference; and (2) request deadlines be set for case management reports and reply reports to be

1 filed. Pursuant to this Court's order [Doc. #30] following a telephonic status conference on
2 August 23, 2013, the parties hereby inform the Court that they wish resolve their outstanding
3 discovery disputes, as described in Doc. #28, through the Court's case management process and
4 will file separate reports outlining their respective positions. The parties agree that filing
5 respective case management reports simultaneously that address the seven separate and distinct
6 discovery disputes is a more efficient process to resolve the issues rather than filing individual
7 motions per issue and cross motions. Given the number and complexity of the issues to be
8 addressed in the parties' respective reports, the parties also respectfully request an opportunity
9 to file simultaneous reply case management reports. The parties make this request in order to
10 provide the Court their full positions to resolve the discovery disputes and to allow the Court
11 time and opportunity to consider the arguments and authorities set forth in the parties'
12 respective reports and replies.

13 These requests are made jointly by the parties after working diligently and in good faith
14 through the meet and confer process. As further directed by this Court, the parties have jointly
15 contacted the Deputy Clerk and scheduled a case management conference for October 10, 2013,
16 at 9:00 a.m.

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1. September 23, 2013: Deadline for the parties to file separate case management reports.
2. October 3, 2013: Deadline for the parties to file reply case management reports.
3. October 10, 2013, at 9:00 a.m.: Case Management Conference

Attorney for Defendant
Wedco, Inc.

THE HONORABLE VALERIE P. COOKE
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF CM/ECF SERVICE

I am, and was at the time the herein mentioned service took place, a citizen of the United States, over the age of eighteen (18) years.

I am employed in the Legal Unit of the Las Vegas Local Office of the U. S. Equal Employment Opportunity Commission. My business address is U.S. Equal Employment Opportunity Commission, 333 Las Vegas Boulevard South, Suite 8112 Las Vegas, Nevada 89101. On the date that this declaration was executed, as shown below, I served the foregoing

**STIPULATION AND [PROPOSED] ORDER TO SET A CASE MANAGEMENT
CONFERENCE TO RESOVLE DISCOVERY DISPUTES**

via the Case Management/Electronic Case Filing (CM/ECF) system at Las Vegas, Clark County, Nevada, to:

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Ricardo N. Cordova, Esq.
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I declare under penalty of perjury that the foregoing is true and correct.
Executed on August 27, 2013 at Las Vegas, Nevada .

/s/Elizabeth A. Naccarato
Elizabeth A. Naccarato